

MARK P. RESSLER (*pro hac vice*)
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
1633 Broadway
New York, New York 10019
Telephone: (212) 506-1700
Facsimile: (212) 506-1800
Email: mressler@kasowitz.com

CHRISTOPHER J. McNAMARA (SBN 209205)
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
101 California Street, Suite 2300
San Francisco, California 94111
Telephone: (415) 421-6140
Facsimile: (415) 398-5030
Email: cmcnamara@kasowitz.com

Attorneys for Defendants
Medfiler LLC, Alvin Rapp,
and Evan Rapp

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

POGA MGMT PTNRS LLC,

Plaintiff,

v.

MEDFILER LLC, d/b/a RPG
CONSULTANTS, ALVIN RAPP, EVAN
RAPP and DOES 1-20,

Defendants.

Case No. 4:12-cv-06087-SBA

**STIPULATION TO EXTEND DEADLINE
TO RESPOND TO FIRST AMENDED
COMPLAINT AND DATE FOR INITIAL
DISCLOSURES**

Before the Hon. Sandra Brown Armstrong
Courtroom 1, 4th Floor

Date of Removal: November 30, 2012
Trial Date: December 8, 2014

Whereas, the state court action titled *POGA MGMT PTNRS LLC v. Medfiler LLC, et al.*, Superior Court Case No. CGC-12-524785, was removed to this Court on November 30, 2012;

Whereas, on January 17, 2013, Defendants filed a Motion to Dismiss Under FRCP 12(b)(2) for Lack of Personal Jurisdiction (“Motion to Dismiss”), setting the hearing date for March 7, 2013;

Whereas, the case was reassigned to Judge Armstrong on January 22, 2013, and the March 7, 2013, hearing date was vacated;

Whereas, Defendants filed a Re-Notice of Motion to Dismiss Under FRCP 12(b)(2) for Lack of Personal Jurisdiction (“Motion to Dismiss”), setting the hearing date for April 16, 2013 at 1 p.m.;

Whereas, on September 30, 2013, the Court granted in part and denied in part Defendants’ Motion to Dismiss and gave the Plaintiff leave to file an amended complaint;

Whereas, on November 1, 2013, the Plaintiff filed a First Amended Complaint (“FAC”);

Whereas, the parties have agreed that Defendants’ response to the FAC shall be filed on or before November 27, 2013;

Whereas, the parties have agreed that the initial disclosures required by FRCP 26(a) shall be served on or before December 13, 2013;

THE PARTIES HEREBY STIPULATE to the following:

1. Defendants’ response to the FAC shall be filed on or before November 27, 2013; and
2. The initial disclosures required by FRCP 26(a) shall be served on or before December 13, 2013.

///

///

///

///

///

///

1 DATED: November 14, 2013

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

2
3 By: /S/ Christopher J. McNamara

4 Christopher J. McNamara

5 Attorneys for Defendants Medfiler LLC,
6 Alvin Rapp, and Evan Rapp

7 DATED: November 14, 2013

CURIALE WILSON LLP


8
9 By: /S/ Joseph C. Wilson

10 Joseph C. Wilson

11 Attorneys for Plaintiff POGA MGMT PTNRS LLC

12
13 **PURSUANT TO STIPULATION, IT IS SO ORDERED,**

14
15 DATED: 11/18/2013

16
17 
18 Hon. Sandra Brown Armstrong
19 United States District Court Judge